



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

March 7, 2013

BRENT ANDERSON, TREASURER
MASSACHUSETTS REPUBLICAN PARTY
85 MERRIMAC ST., SUITE 400
BOSTON, MA 02114

Response Due Date

04/11/2013

IDENTIFICATION NUMBER: C00042622

REFERENCE: AMENDED 30 DAY POST-GENERAL REPORT (10/18/2012 -
11/26/2012), RECEIVED 12/19/2012

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 5 item(s):

1. Schedule A supporting Line 12 discloses voids of contributions received from "MRS. MARY JO KOVACEVICH" and "MR. RICHARD M. KOVACEVICH." However, it appears that these contributions were not previously reported by your committee. Please amend the appropriate reports(s) to disclose the original contribution or provide clarifying information. (2 U.S.C. § 434(b) and 11 CFR § 104.3(a) & (b))
2. On Schedule A supporting Line 12, your committee disclosed a contribution(s) from "ROB HIRT," "MR. JAMES E. MACDOUGALD," "MRS. BEVERLY J. OREN," and "MR. STEPHEN W. SANGER" with an aggregate year-to-date total(s) which is greater than the total receipts disclosed from this individual(s). Please provide clarifying information or amend the report covering the period during which the omitted transaction(s) occurred. (2 U.S.C. § 434(b) and 11 CFR § 104.3(a)(4))
3. Schedule B of your report discloses in-kind contributions to your committee. Please be advised that the value of in-kind contributions must be added to the receipts and disbursements total in order to avoid either inflating or deflating the cash on hand amount, and itemized on the appropriate Schedules A and B. (11 CFR § 104.13(a)) Please amend your report by itemizing the in-kind contributions on Schedule A.

MASSACHUSETTS REPUBLICAN PARTY

Page 2 of 3

4. Schedule B of your report discloses reimbursements to staff for apparent travel and subsistence advances in which the total amount reimbursed exceeds \$500. When the reimbursement amount to staff for travel and subsistence advances exceeds \$500, the payments by staff to any one vendor that make up the reimbursement may have to be itemized. For example, if the related payments to any one vendor aggregate in excess of \$200 for the calendar year, the staff advance payment to the vendor must also be itemized in a memo entry for that reimbursement. Each memo entry must include the complete name and address of the original vendor, as well as the date, amount and detailed purpose of the advance. If itemization is not necessary for a particular reimbursement to staff in excess of \$500, you must indicate so in an amendment to this report. Please amend your report to include the missing or clarifying information. See Advisory Opinion 1996-20 for additional clarification. (11 CFR § 104.9)

5. Schedule B supporting Line 30(b) of your report discloses a payment(s) for "DIRECT MAIL PRINTING & POSTAGE," "TELEMARKETING," and "TELEMARKETING & DATA MANAGEMENT SERVICES" which is categorized as Federal Election Activity and therefore, may require the disclosure of the candidate(s) this activity should be attributed to. Expenditures and disbursements for public communications that refer to a clearly identified candidate for Federal office and that promote, support, attack or oppose any candidate for Federal office, meet the definition of Federal Election Activity under 11 CFR §100.24 and should be disclosed on Schedule B for Line 30(b) along with the identity of the candidate(s).

Further, please be advised that public communications that meet the definition of Federal Election Activity and that also contain express advocacy as defined under 11 CFR §100.22, but do not meet the conditions of exempt activity, would constitute an in-kind contribution, an independent expenditure or a coordinated party expenditure and should be properly disclosed on a Schedule B, E or F supporting Lines 23, 24 or 25, as appropriate rather than on Schedule B for Line 30(b). Please clarify if this activity meets the definition of Federal Election Activity or if it contains express advocacy and amend your report to properly disclose this activity, if necessary.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will**

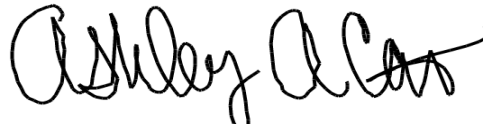
MASSACHUSETTS REPUBLICAN PARTY

Page 3 of 3

not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1173.

Sincerely,

A handwritten signature in black ink, appearing to read "Ashley A Carter", with a stylized flourish at the end.

Ashley Carter
Senior Campaign Finance Analyst
Reports Analysis Division